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MICHAEL VALENTINE and JASON  
CLARK (limited appearance)

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

## FORTINET, INC., a corporation

Case No. 3:13-cv-05831-EMC

Plaintiff,

VS.

SOPHOS, INC., a corporation, MICHAEL VALENTINE, an individual, and JASON CLARK, an individual

## Defendants

**JOINT STIPULATION AND  
[PROPOSED] ORDER MOVING THE  
DATE FOR THE HEARING ON  
CLARK'S MOTION TO DISMISS,  
VALENTINE'S MOTION TO  
COMPEL ARBITRATION, AND  
SOPHOS' MOTION TO STAY**

SOPHOS INC. and SOPHOS LTD.,  
corporations,

Judge: Honorable Edward M. Chen

## Counterclaim Plaintiffs,

VS.

FORTINET, INC., a corporation,

#### **Counterclaim Defendant.**

1 By and through their respective undersigned counsel, Plaintiff Fortinet, Inc. ("Fortinet")  
2 and Defendants Sophos, Inc. ("Sophos"), Michael Valentine ("Valentine") and Jason Clark  
3 ("Clark") (collectively, the "Parties"), hereby agree and stipulate as follows:

4 WHEREAS, the date for the hearing on Clark's Motion to Dismiss (Dkt. No. 22) and  
5 Valentine's Motion to Compel Arbitration and Sophos' Motion to Stay (Dkt. No. 24) are both  
6 currently set for Thursday, March 13, 2014 at 1:30 p.m.;

7 WHEREAS, lead counsel for Fortinet is scheduled to be in a jury trial (before the  
8 Honorable William H. Alsup, U.S. District Judge) in another, unrelated matter on that same date;  
9 and

10 WHEREAS, counsel for Fortinet has requested and counsel for Sophos, Clark and  
11 Valentine have agreed, to move the hearing from March 13 to March 27;

12 IT IS HEREBY STIPULATED AND AGREED that the hearing date for Clark's Motion to  
13 Dismiss and Valentine's Motion to Compel Arbitration and Sophos' Motion to Stay be changed  
14 from Thursday, March 13, 2014 at 1:30 p.m. to Thursday, March 27, 2014 at 1:30 p.m., or to any  
15 date and time thereafter acceptable to the Court.

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1 DATED: February 26, 2014

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3 QUINN EMANUEL URQUHART &  
4 SULLIVAN, LLP

5 By /s/ John M. Neukom

6 John M. Neukom (Bar No. 275887)  
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11 Facsimile: (415) 875-6700

12 Attorneys for Plaintiff FORTINET, INC.

13 DATED: February 26, 2014

14 DLA PIPER LLP (US)

15 By /s/ Sean C. Cunningham

16 SEAN C. CUNNINGHAM  
17 KATHRYN RILEY GRASSO  
18 RYAN W. COBB  
19 DAVID R. KNUDSON  
20 TODD S. PATTERSON (*pro hac vice*)

21 Attorneys for Defendant and Counterclaim  
22 Plaintiff SOPHOS INC., Counterclaim  
23 Plaintiff SOPHOS LTD. and Defendants  
24 MICHAEL VALENTINE and JASON  
25 CLARK (limited appearance)

26 **SIGNATURE ATTESTATION**

27 Pursuant to Local Rule 5.1(i)(3), I attest under penalty of perjury that concurrence in the  
28 filing of this document has been obtained from Sean C. Cunningham.

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30 /s/ John M. Neukom

31 John M. Neukom

1                   **PROPOSED ORDER**  
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Before the Court is the Parties' Joint Stipulation to move the date of the hearing on Defendant Jason Clark's Motion to Dismiss (Dkt. No. 22) and Defendant Michael Valentine's Motion to Compel Arbitration and Defendant Sophos, Inc.'s Motion to Stay (Dkt. No. 24) from Thursday, March 13, 2014 at 1:30 p.m. to Thursday, March 27, 2014 at 1:30 p.m.

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Dated: 2/28/14

